

July 19, 2002

Ms. Magalle Roman Salas, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-B204
Washington, DC 20554

RE: Docket #01-108

Dear Ms. Roman Salas:

Upon hearing concerns from other California public agencies, we are transmitting a letter to the Acting Secretary, expressing our views on the proposed rulemaking regarding relief of analog cellular service. As advised by the Los Angeles County Service Authority for Freeway Emergencies, we are sending the letter to you as an ex parte document.

We respectfully request that the information contained in the attached letter be considered by the FCC at the time that a decision is being rendered.

If you have any questions, please contact me at (805) 961-8908.

Sincerely,

Jim Kemp
Deputy Director, Programs
Santa Barbara County
Service Authority for Freeway Emergencies

cc: The Honorable Diane Feinstein
The Honorable Barbara Boxer
Santa Barbara County Congressional Delegation
Linda Chang, Wireless Telecommunications Bureau, FCC
Blaze Scinto, Deputy Division Chief, Policy Division, FCC
D'Wana Perry, Private Wireless & Public Safety Division, FCC

July 19, 2002

William F. Caton, Acting Secretary
Federal Communications Commission
Office of the Secretary
445 – 12th Street, SW
Washington, DC 20554

Dear Mr. Caton:

This letter provides comments regarding proposed modifications to Part 22 of the FCC rules requiring cellular radiotelephone service providers to provide analog cellular service. If the FCC elects to relieve cellular service providers of the requirement to provide analog service, the Santa Barbara County Service Authority for Freeway Emergencies respectfully recommends that a phase-in period for the digital cellular service conversion be provided. It may take several years for public agencies operating highway call boxes to replace existing analog radiotelephones with digital equipment. The FCC must consider the substantial costs and time that will be required to convert highway call box systems to digital technology.

Santa Barbara County SAFE is a local governmental authority responsible for providing motorist aid services within Santa Barbara County, California. The SAFE agency operates and maintains approximately 340 emergency call boxes installed along all freeways and state highways in Santa Barbara County. Most of the call boxes use analog cellular service, provided by AT&T Wireless, to provide a means of communication between motorists and a California Highway Patrol dispatcher. The Santa Barbara County SAFE is in the process of implementing a capital replacement plan that will include an upgrade to digital cellular service, along with several improvements to provide better access for the hearing impaired and physically disabled. The construction contract is tentatively scheduled for award sometime between July 1, 2003 and June 30, 2004.

The Santa Barbara County SAFE recognizes that several other public agencies may be negatively impacted if the transition to digital cellular service is forced upon the call box program without a significant transition period. If an agency were financially or otherwise incapable of changing their entire system, the stranded roadside users of the call boxes would be left without the service. Therefore, Santa Barbara County SAFE proposes that the FCC, should they grant relief to the cellular radiotelephone service providers, mandate that cellular carriers enter into agreement with the various SAFE agencies to reasonably assist the transition process as the systems are upgraded.

I thank you for the opportunity to inform the FCC of our concerns. Please contact me at (805) 961-8908 or Heather Diez at (805) 961-8912 for further information.

Sincerely yours,

Jim Kemp
Deputy Director, Programs
Santa Barbara County Service Authority for Freeway Emergencies

cc: The Honorable Diane Feinstein
The Honorable Barbara Boxer